

DATE: March 11, 1980
SUBJECT: NESHAPS Investigation

FROM: Billy J. Fairless, Ph.D.
Acting Chief, Technical Services Branch, SVAN

TO: Michael J. Sanderson
Chief, Compliance Branch, ENFC

Forwarded for your review is the NESHAPS Investigation for Certain-Teed
Products Corporation and GAF Corporation.

Attachment

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Superfund

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NESHAPS INVESTIGATION

Certain-Teed Products Corporation
Pipe and Plastic Group
600 St. Cyr Road
St. Louis, Missouri

and

GAF CORPORATION
Building Products Division
9215 Riverview Drive
St. Louis, Missouri

An inspection tour was made of the GAF Corporation-Certain-Teed Products Corporation common waste storage piles on December 12, 1979 by Bob Kaatman, Missouri Department of Natural Resources and William H. Longston, Surveillance and Analysis Division, Environmental Protection Agency.

Plant personnel contacted were Mr. J. Lebo, Assistant Plant Manager of GAF Corporation and Mr. M. W. McCauley, Office Manager of Certain-Teed Products Corporation. This inspection series is a follow-up to inspections made of these two facilities during the fall of 1978 and winter of 1979. The reader is referred to the following inspection reports for the necessary background information related to these two sources.

NESHAPS-NPDES Compliance Inspection Report, GAF Corporation, October 23, 1978
NESHAPS-NPDES Compliance Inspection Supplemental Report, GAF Corporation,
November 3, 1978
NESHAPS-NPDES Compliance Inspection Report, Certain-Teed Products Corporation,
February 14, 1979

Both facilities at the time of the above inspections manufactured concrete asbestos products which contain approximately 12 percent asbestos. Waste material from these two processes was stored in large open storage areas adjacent to the two manufacturing facilities, forming a common large pile of broken pieces, fine dust, and water slurry of concrete-asbestos material covering an area of several acres.

Waste water and general area drainage from this large open storage area discharged through a number of different channels into Maline Creek, which formed a common boundary for these two facilities. Maline Creek discharges into the Mississippi River approximately one half mile from the waste sites.

During the above mentioned inspections and several others during the following several months, many samples of both the waste piles, drainage water from the waste piles and water samples along both Maline Creek and the Mississippi River were collected and analyzed for asbestos content. See Appendix A for a summary of these findings and a discussion of their significance.

A meeting of EPA, MDNR, and GAF personnel was held on December 13, 1978 in St. Louis to discuss the significance of these waste piles and their potential insult to the environment. See Memo: Asbestos Waste Pile Closing - GAF St. Louis, Missouri, dated January 17, 1979, (attached). The conclusion of this meeting was that the company indicated the pile would be closed concurrently with the termination of product manufacture in early 1979. The closure plans were as follows:

1. Regrade dump to have approximately 3:1 slope with the top having 4 percent grade to minimize erosion.
2. Cover entire dump area (6-8 acres) with at least 6 inches of "non-asbestos containing" soil cover.
3. Then seed the cover with selected grasses.

Similar agreements were made with personnel of the Certain-Teed Products Corporation.

The purpose of this inspection tour was to determine if the asbestos waste piles for both facilities had been so treated as to completely isolate the asbestos-containing material from the environment.

At the time of this inspection, the asbestos-containing product line at the GAF Corporation had been closed down since February - March of 1979, the production equipment removed from the site and the space converted to warehouse space associated with a polyurethane roof insulation facility which first started production in July 1978

Similarly, production at the Certain-Teed facility ended on May 11, 1979; the building was stripped of all production equipment, and the stripped building and site are currently for sale.

The staff at this facility consists of several clerical, and office manager and several yard personnel. The remaining activity at this site consists of sale and subsequent removal of stock piled concrete-asbestos pipe.

GAF and Certain-Teed proceeded to fulfill their promises of December 1978 by letting a contract with Reitz and Jens, Inc. Consulting Engineers, 111 South Meramec Avenue, St. Louis, Missouri 63105.

Mr. David E. Murry, Vice President of this firm provided a copy of the information to all bidders (which includes the Scope of Work) and a proposed grading plan for the combined GAF Certain-Teed site. Both documents are attached.

A review of plant operation logs at the GAF site indicated that initial grading was initiated on September 24, 1979 with the asbestos free layer of soil completed during the first week in October. The site was then seeded.

At the time of this inspection, grass cover was evident through the straw cover but not yet well developed.

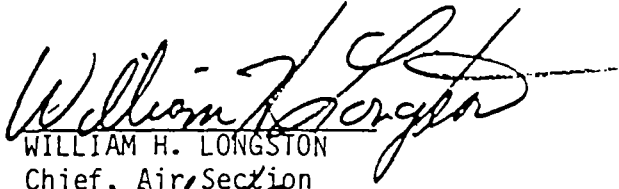
An inspection tour of the entire site indicated that all exposed asbestos material had been covered and stabilized and no longer presents any threat to the environment. Material along Maline Creek was stabilized by a rock, rip-rap of one man boulders. Stream bank stabilization at the extreme north end of the Certain-Teed portion of the facility includes some large unbroken sections of concrete asbestos pipe. These are not considered a potential source of asbestos into the environment.

CONCLUSIONS

The inspection of these two asbestos disposal sites indicated that the asbestos containing material has been isolated from the environment in a manner consistent with the regulations contained in 40 CFR part 61.25.

RECOMMENDATIONS

It is recommended that this site be declared neutralized, and that no further action be taken as a result of this inspection.


WILLIAM H. LONGSTON
Chief, Air Section
Date: 3/11/80

APPENDIX A

Asbestos Profile

Due to the high potential for asbestos contamination of both Maline Creek and the Mississippi River from these sites, an asbestos profile was obtained by collecting water samples at various locations along these two streams. The results of this profile are contained in Appendix page A-2.

Sample descriptions are as follows:

	Type	Location
EL0001	Solid	Certain-Teed Waste Pile
EL0002	Solid	Certain-Teed Waste Pile
EL0003	Water	Certain-Teed Outfall 001
EL0004	Water	Certain-Teed Drainage ditch
EL0005	Water	GAF Outfall 001
EL0008	Water	Maline Creek at Riverview Drive
EL0009	Water	Mississippi River at Downtown Cape Girardeau
EL0010	Water	Mississippi River at Crystal City Missouri
EL0011	Water	Mississippi River at St. Louis City Water Works intake (site above Maline Creek)

As a result of the unusually high count observed in the Cape Girardeau sample, a second series of samples was collected along the Mississippi River at intakes to various city water treatment facilities. These results are tabulated in Appendix page A-3.

Sample descriptions are as follows:

EH0101	Cape Girardeau raw drinking water prior to treatment (Cape Rock Plant #1)
EH0102	Cape Girardeau finished drinking water (Cape Rock Plant #2)
EH0103	St. Mary's finished drinking water
EH0104	St. Genevieve's finished drinking water
EH0105	Crystal City's finished drinking water

As noted on page A-3 some questions still existed concerning sample EH 0104. This sample was further refined and reanalyzed in November 1979. See Appendix page A-4.

It can be concluded from these data that no significant amount of asbestos can be found in drinking water supplies which were exposed to potential contamination from the GAF Certain-Teed waste site.